The dogs deserved more and now the country deserves answers.

Questions for Dogs Trust on why they fought to keep puppies in pet shops
BACKGROUND: AN EVER CHANGING STANCE

Dogs Trust’s position on the sale of dogs through pet shops and other third party sales has altered quite dramatically over the last eight years. In 2009 it was actively “campaigning for a total ban on the battery farming and sale of puppies in pet shops.” Its Dog Manifesto that year called for “The introduction of Secondary Legislation on Pet Vending under the Animal Welfare Act which would prohibit the sale of puppies in pet shops.”

In January 2010, the charity launched its Battery Farmed Dogs campaign, claiming that “Many of these ‘battery farmed’ puppies are sold on through classified or online adverts or they end up for sale in pet shops. Dogs Trust does not consider that a pet shop is a suitable place for the sale of puppies.”

As Christmas 2011 approached, Dogs Trust called upon Harrods and other pet shops across the UK to “stop selling puppies at Christmas.”

In October 2013, the Mirror newspaper published a story about a puppy that died within a month of purchase from a licensed pet shop. The article included a quote from Dogs Trust’s Veterinary Director Paula Boyden. “Dogs Trust is opposed to the sale of puppies through pet shops and other retail outlets, as they can encourage impulse buying.” A couple of months later, Harrods decided to no longer sell puppies in its stores and Clarissa Baldwin, Dogs Trust Chief Executive commented in response that “A pet shop is not an appropriate environment in which to sell puppies and kittens.”

The Dogs Trust Annual Review for 2014 emphasised this view: “Puppy Superstores: We strongly believe that pet shops and pet supermarkets are far from the ideal place to purchase a puppy.”

1 http://opinion-former-resources.politics.co.uk/microsites2/1351417/graphics/dogmanifesto.pdf
3 http://www.mirror.co.uk/news/uk-news/pet-shop-puppy-sales-should-2485960
BACKGROUND: AN EVER CHANGING STANCE

In 2014 Dogs Trust gave their backing to the 5Pup Aid petition to 'Ban the sale of young puppies & kittens without their mothers being present.' Dogs Trust shared the petition multiple times on Facebook and helped secure a staggering 111,572 signatures, which resulted in a three hour parliamentary debate on 4th September, 2014. A spokesperson for the Dogs Trust, warned that people should “look particularly at the interaction between the mother and its puppy, rather than simply being satisfied with a viewing of ‘the mother’ which may not be the pup’s mother at all.”

Dogs Trust published another “Dog Manifesto in 2015. Like its predecessor, this document mentions the sale of pets, but the message has changed – calling for “a review of the Pet Animals Act 1951 to consider its effectiveness in the twenty-first century culture of online sales and impulse buys.”

As 2016 drew to a close, Dogs Trust’s view was that it “would ideally want to see a world where third-party sales were not happening but we do not believe that it is in the best interests of animal welfare to rush into a ban as a knee-jerk response to the huge numbers of illegally imported and so-called puppy farmed dogs for sale in the UK.”

Thus, Dogs Trust advised George Eustice and DEFRA against implementing a ban on third party sales of puppies by pet shops and other third party sellers (puppy dealers).

QUESTION 1: Does Dogs Trust have evidence that pet shops can be suitable places for the sale of puppies?

http://www.dogworld.co.uk/story.php/173220/34/celebrity_vet_claims_charities_have__vested_interest__in_third_party_puppy_sales
https://www.theyworkforyou.com/wrans/?id=2016-12-13.57520.h&s=section%3Awrans+speaker%3A24870#g57520.q0
LATEST POSITION STATEMENT

Dogs Trust’s current position (February 2017) is that it “believes that a ban on the third-party sale of dogs and puppies would have unintended consequences for dog welfare at the current time.”

Dogs Trust gives several reasons why it believes a ban would not put “power in the hands of the enforcers by providing essential traceability and transparency of everyone involved in the trade”:

- It’s a knee-jerk response.
- There is a lack of ‘good breeders’ and desired breeds to meet this demand.
- It would push illegal traders into even more devious ways of duping the public into buying underage, illegally imported or badly socialised puppies.

(Dog World, 11th January 2017)

A further statement has been issued (February 2017) with additional reasons for objecting to a ban:

- The ability of already stretched Local Authorities to enforce the ban, with no plan to alleviate any cost burden.
- We estimate 900,000 dogs are bought or rehomed each year in the UK. We are already concerned there are not enough ‘good’ breeders to satisfy this demand. Therefore, a ban on third party sales will only exacerbate this problem, leading to even more traders choosing to supply puppies illegally.
- A premium may be placed on puppies, making them a more desirable commodity to supply and potentially even more attractive to criminals involved in this activity.
- If dogs are in short supply and expensive to buy, dog theft is likely to increase.
- The assumption that the welfare of the dogs involved is ensured if sold from their place of birth. The human instinct to ‘rescue’ puppies sold from low-welfare establishments could mean that puppies continue to be sold irrespective of the welfare standards of their place of birth.
- The failure of a ban to deal with the current problems we know exist with both licenced and unlicensed dog breeding.
- The general public’s awareness of the Animal Welfare Act is limited, so cannot be relied on when assessing the suitability of a breeding premise when going to purchase a puppy.
- Any ‘exemption’ for rescue and rehoming organisations may lead to some traders setting themselves up as a rescue and rehoming organisation to get around the ban.
- There is currently no statutory or single body overseeing the standards of animal welfare in rescue and rehoming organisations – so nobody to control those who sets themselves up as one, or those who charge owners to rehome a dog for a profit.

DOGS TRUST RECOMMENDATIONS

Dogs Trust wants a registration and licensing system to be introduced which would put the power in the hands of the enforcers by providing essential traceability and transparency of everyone involved in the trade. At its 125 year anniversary in December 2016, Dogs Trust CEO Adrian Burder said Dogs Trust was:

“… calling for a registration and licensing system to ensure better enforcement and traceability of anyone breeding, selling or transferring the ownership of dogs.” The charity proposed that “anyone selling a single dog or a single litter should be registered with their Local Authority and that anyone breeding two or more litters a year should be licensed as a breeder.”

Dogs Trust suggests this system should:

- Help give prospective puppy buyers more confidence.

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Provide local authorities with a definitive list of individuals involved in this trade.

As a recommendation following its investigation into the illegal puppy trade, Dogs Trust also called for “puppies entering the UK from abroad under the Pet Travel Scheme to be at least six months of age”, suggesting that it would “bring about the end to illegal puppy imports.”

**QUESTION 2**: Can Dogs Trust provide evidence that licensing has a proven record of success at ‘ensuring enforcement and traceability’?

**QUESTION 3**: Does Dogs Trust believe that prospective puppy buyers should have ‘more confidence’ if a puppy seller is registered or holds a licence?

This review seeks to examine Dogs Trust view on banning third party sales. It will consider these concerns against Dogs Trust’s recommendations and the concerns that Dogs Trust has specifically highlighted about the sale of puppies in pet shops and the puppy trade in general.

**OBJECTIONS RAISED TO A BAN ON THIRD PARTY SELLING**

- **A KNEE-JERK RESPONSE TO THE HUGE NUMBERS OF ILLEGALLY IMPORTED AND SO-CALLED PUPPY FARmed DOGS FOR SALE IN THE UK**

Dogs Trust itself called for “The introduction of Secondary Legislation on Pet Vending under the Animal Welfare Act which would **prohibit the sale of puppies in pet shops**” in 2009. The Dog Manifesto stated “Sadly many dogs are bred for a quick profit by intensive breeders who have little or no regard for their basic needs. Many of these battery farmed dogs end up for sale in pet shops.”

**QUESTION 4**: Does Dogs Trust believe that calling for a ban in 2009 was a knee-jerk response to dogs being bred for a quick profit by intensive breeders who have little or no regard for their basic needs?

In 2009, Dogs Trust stated “We prefer to use the term "battery farmed dogs" rather than "puppy farms" as this better conveys to members of the public the terrible conditions that some dogs are kept in. Dogs on battery farms are born and live in filthy, unsanitary conditions, they are often denied proper veterinary care, and can be isolated, ignored and left in the dark for days on end.”

**QUESTION 5**: Does Dogs Trust now believe that ‘battery farmed’ is no longer an appropriate term for describing the intensive commercial breeding of dogs?

Banning the commercial sale of puppies through licensed pet shops to tackle the trade in puppies bred under intensive, low welfare conditions is increasingly being adopted as a strategy throughout the world. Albuquerque, New Mexico banned pet shops from selling commercially bred puppies in 2006 and 237 jurisdictions in North America to date have passed bans or strong restrictions on retail sales of puppies. 109 bans were passed in 2016 alone, demonstrating a steady upward trend. Pet shops will also be banned from selling puppies and kittens in the state of Victoria, Australia unless the animals have come from a registered pound, animal shelter or foster carer.

Bans also under consideration in UAE and Spain. The ongoing uptake of this strategy by administrations world-wide indicates that it is both practical and successful.

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11https://www.dogstrust.org.uk/news-events/issues-campaigns/puppy-smuggling/the-scandal
THE LACK OF ‘GOOD BREEDERS’ AND DESIRED BREEDS TO MEET DEMAND

In its 2015 factsheet 'Your New Puppy', Dogs Trust states a good breeder will “Not sell any dog to a commercial wholesaler, pet shop, dealer or other retail outlet.”

**QUESTION 6:** What evidence does Dogs Trust have to support the belief that “there are not enough ‘good’ breeders to satisfy this demand”?

**QUESTION 7:** Does Dogs Trust believe some purchasers will have no option but to buy a puppy from licensed third party sellers because there are not enough ‘good breeders’?

**QUESTION 8:** Why does Dogs Trust believe a ban on third party sales will have an impact on the number of ‘good breeders’, if ‘good breeders’ will not sell puppies to third parties?

**QUESTION 9:** What evidence does Dogs Trust have to indicate that the demand for puppies would not be met by ‘good breeders,’ if alternative sources that flood the market with poorly bred puppies were outlawed?

Dogs Trust advises potential purchasers that it is “important for you to go to a reputable breeder when choosing a puppy.”

**QUESTION 10:** How does Dogs Trust suggest purchasers find a reputable breeder if ‘there are not enough ‘good breeders to satisfy this demand’?

**QUESTION 11:** Does Dogs Trust have any suggestions for increasing the number of ‘good breeders’ or reducing demand?

**QUESTION 12:** Does Dogs Trust believe that demand must be satisfied, even at the expense of animal welfare and consumer protection?

Dogs Trust state that there are a lack of ‘desired breeds’ to meet demand but it also stated in April 2016, "Sadly, Dogs Trust has seen an 84% increase in the number of ‘handbag dogs’ who are perceived as a fashion accessory, but later abandoned after their owners realise the responsibility of caring for a dog.”

**QUESTION 13:** Why does Dogs Trust believe ‘a lack of desired breeds to meet demand’ is a problem when it has seen an 84% increase in the abandonment of such ‘desired breeds’?

Dogs Trust indicate that the most smuggled dog breeds in the UK are French Bulldogs, Pugs, Dachshunds and English Bulldogs. Three of these breeds are ‘brachycephalic’ (short-nosed) and in 2015, research co-funded by Dogs Trust found that “flattened faces were found to greatly increase the risk of developing a debilitating, lifelong respiratory condition leaving dogs chronically short of breath. Breeds shown to be at high risk include the Pug, French Bulldog and English Bulldog”.

**QUESTION 14:** Why is Dogs Trust concerned about the lack of ‘desired breeds to meet demand’ when these desired breeds are at a greatly increased risk of developing a debilitating, chronic respiratory condition?

Dogs Trust states that it cares for around 17,000 dogs a year. In January 2017, Dogs Trust revealed that it had received a massive 54% increase in dogs handed over to its 20 rehoming centres across the UK in the period 20th December - 2nd January compared with the same time last year, with 127 unwanted dogs handed in during this two-week period alone.”

Dogs Trust’s 2016 ‘Stray Dog Survey’ found that “over 37,000 dogs remained unclaimed in Council pounds last year.”

**QUESTION 15:** Why is Dogs Trust concerned about satisfying demand when it has seen a 54% increase in abandoned dogs over the Christmas period and found that more than 37,000 dogs remained unclaimed in council pounds?

In its advice sheet ‘Getting a Puppy’, Dogs Trust asks “Why buy a puppy from a breeder when there are thousands of lovely unwanted and abandoned dogs in need of homes at dog rescue centres all around the UK?” On the website it also states “There are lots of ways to get a dog. We think rehoming is the best one”

**QUESTION 16:** If Dogs Trust think that rehoming is the best way of getting a dog, why is it concerned about the lack of good breeders and breeds when there are thousands of unwanted and abandoned dogs in need of homes?

Dogs Trust (along with other charities) has warned that impulse purchasing of puppies results in high levels of abandonment. It is therefore very unlikely that banning third party puppy sales – sellers with the highest motivation to actively encourage impulse purchases – would have anything other than a positive impact. Genuine responsible breeders will ensure that they have good homes lined up before breeding a litter and are therefore likely to adjust their breeding plans accordingly. Arguably, flooding the market with puppies originating from puppy farms in the UK and Europe will reduce the number of puppies being bred by responsible breeders as there are fewer good homes available, and the demand for puppies could be inflated due to the ease of making impulse purchases. Responsibly bred dogs are also likely to live longer and therefore reduce the number and frequency of ‘replacement’ purchases.

**ILLEGAL TRADERS WOULD BECOME MORE DEVIOUS**

Dogs Trust has already highlighted that illegal traders are using duplicitous methods to mislead purchasers: “These dealers often disguise themselves online as loving family homes in order to dupe their buyers so please do your research before you embark on a purchase.”

**QUESTION 17:** In Dogs Trust view, why do illegal dealers exist outside the licensing framework?

**QUESTION 18:** What proof does Dogs Trust have that a ban will push illegal dealers (already operating outside the law) to alter their methods?

**QUESTION 19:** Does Dogs Trust feel that educating prospective purchasers would help them identify warning signs for illegal traders?

**QUESTION 20:** Does Dogs Trust feel that a potential reduction of ‘on demand’ availability of puppies would compel purchasers to ‘do their research’?

It is a responsibility of law enforcement agencies to protect consumers against potential fraud, misleading advertising and illegal trading, irrespective of the ‘goods’ offered for sale. **There have been at least 10 successful prosecutions against illegal puppy dealers during 2016/17.**

**ENFORCEMENT**

Dogs Trust states it has concerns about “the ability of already stretched Local Authorities to enforce the ban, with no plan to alleviate any cost burden”

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QUESTION 21: Has Dogs Trust conducted any research that enables it to predict the potential number of illegal sellers that would require enforcement following a ban?

QUESTION 22: Has Dogs Trust contacted local authorities to investigate how they have funded enforcement action against unlicensed puppy dealers in recent years?

QUESTION 23: Would Dogs Trust consider assisting local authorities to help with any enforcement costs (i.e. kennelling)?

QUESTION 24: Why does Dogs Trust believe that enforcement action against a prohibited activity (which also carries consumer risks and may involve other criminal behaviour) would become the sole duty of local authorities, when other enforcement agencies already often take active roles?

The commercial puppy trade depends entirely upon high profile (online) advertising to attract new purchasers. This is a considerable vulnerability which is exploited by a number of different enforcement agencies to detect and take action against those operating illegally. Prosecutions of illegal dealers have demonstrated that effective enforcement is possible and successful. Prohibiting the activity of commercial third party selling of puppies will provide a mandate for classified websites to proactively identify, block and notify the authorities of potential illegal activity. Changing the status of third party selling in itself will be a deterrent for many traders and preventing easy access to the market will make the trade uneconomical, which will be an additional deterrent. Active enforcement will therefore only be required against the limited number of illegal sellers that remain, and will become easier as the illegal trade is no longer masked by a legitimate presence.

➢ A PREMIUM MAY BE PLACED ON PUPPIES

QUESTION 25: What evidence does Dogs Trust have to indicate that eliminating a point of distribution (rather than the supplier) will have such a significant impact upon the ‘puppy market’ as to inflate prices?

QUESTION 26: Has Dogs Trust any figures for the number of puppies that are sold annually through licensed pet shops?

QUESTION 27: Why does Dogs Trust believe that breeders currently supplying licensed pet shops would not be able to sell directly to the public?

Prohibiting the sale of puppies through licensed pet shops eliminates only a point of distribution, NOT the supplier.

➢ DOG THEFT IS LIKELY TO INCREASE

Dogs Trust stated in March 2016 that incidents of dog theft are on the increase “usually because those responsible wish to breed from or sell the dogs in a bid to make money.”

QUESTION 28: Does Dog Trust feel that enabling potential thieves access to cheaper dogs justifies the third party trade in dogs?

Prohibiting the sale of puppies through third parties only alters the method of reaching the market, so it is very unlikely to drastically reduce the number of puppies being offered for sale. (Staffordshire Bull Terriers and their crosses are statistically far more likely to be stolen than other breeds and this breed is rarely, if ever sold through licensed pet shops. Gun dogs are also routinely targeted by dog thieves and these breeds are also rarely sold by third party sellers.)
PUPPIES WILL CONTINUE TO BE SOLD FROM LOW WELFARE BREEDING ESTABLISHMENTS

One of Dogs Trusts concerns is the “assumption that the welfare of the dogs involved is ensured if sold from their place of birth.”

QUESTION 29: Does Dogs Trust have evidence to show that the welfare of the dogs involved in the commercial puppy trade can be ensured if sold AWAY from their place of birth?

In November 2016, Dogs Trust Ireland launched its #StopKeepingMum campaign, stating “We have to highlight what happens behind the distressing Puppy Farming Trade in Ireland, and, in particular shine a light on the appalling injustice to the Mums who are forced to live in these horrific conditions. We are therefore asking members of the public to stop and think about where the puppies that they are buying actually come from and ‘always ask to see the Mum’ and the puppy interacting each other and to always be concerned if excuses are made as to why you cannot. Seeing mum with her puppy ensures their breeding environment is open for scrutiny”.

QUESTION 30: Does Dogs Trust agree with Dogs Trust Ireland that “Seeing mum with her puppy ensures their breeding environment is open for scrutiny”?

QUESTION 31: Does Dogs Trust feel that puppies from ‘low welfare establishments’ would be less adversely affected if they were sold directly to purchasers than sold through third parties?

QUESTION 32: Does Dogs Trust believe that if people felt the need to ‘rescue’ puppies from low welfare breeding establishments they would take no further action (i.e. to notify enforcement authorities of their concerns?)

The logistics of the third party puppy trade compound the problems that originate in low welfare commercial breeding establishments. Compelling breeders to sell puppies directly to the new owner removes the need for transportation to new premises and the additional period of acclimatisation which increases the risk of disease and delays rehoming. Simply removing these elements considerably reduces the risk to puppies from low welfare establishments. Increased public scrutiny of breeding establishments will also be a motivator to improve standards. A ban on third party puppy sales is the essential first step to improving welfare in intensive commercial breeding establishments.

A BAN WILL FAIL TO DEAL WITH THE CURRENT PROBLEMS WE KNOW EXIST WITH BOTH LICENCED AND UNLICENCED DOG BREEDING

QUESTION 33: What problems do Dogs Trust know exist with both licensed and unlicensed dog breeding?

QUESTION 34: Does Dogs Trust feel that eliminating the market that is almost exclusively supplied by intensive, low welfare, commercial breeding establishments will fail to have any positive impact on such premises?

QUESTION 35: Does Dogs Trust have evidence to show that improvements in dog breeding can be facilitated where establishments sell puppies through third parties?

A level playing field for all breeders drives competition and breeders that fail to meet public expectation will not be as successful, providing a significant incentive for improvement. Selling directly also ensures that breeders receive the entire income from puppy sales rather than just a portion and the additional revenue may encourage investment into the business. Eliminating the highest risk factor from the licensing regime also enables resources to be more effectively focussed on raising standards in breeding establishments.

THE GENERAL PUBLIC CANNOT BE RELIED UPON TO ASSESS THE SUITABILITY OF A BREEDING PREMISE WHEN GOING TO PURCHASE A PUPPY

Dogs Trust issues advice to potential purchasers in the factsheets ‘Your New Puppy’ and ‘Getting a Puppy’. This guidance includes the recommendations “Make sure you see the puppy interacting with the rest of the litter and its mother.” It also provides other tips to help purchasers identify good breeders. In July 2015, Dogs Trust advised purchasers that “It is absolutely essential to see the puppies with their mother.”

Responding to the case of an 19abandoned pug in April 2016, Paula Boyden, Veterinary Director of Dogs Trust wrote:

“This sad case highlights the importance of doing your research and investigating fully where you are buying a puppy from. If the puppy comes with a passport, or you cannot see it with its mother, we urge people to walk away so as not to unwittingly fuel this despicable trade.”

During the 2016 EFRA Inquiry: Welfare of Domestic Pets oral evidence session, Paula Boyden was asked about the feasibility of using a requirement to see puppies with their mother as a solution to some of the pet trade issues. 20(Q104). She replied that this was “the ideal” and that “to see a pup with and interacting with its mum, to know that it has had that good start in life, is critical in having a puppy that is well socialised as it moves through its life.”

QUESTION 36: Does Dogs Trust still consider that seeing a puppy interacting with its mother is critical in having a puppy that is well socialised as it moves through its life?

QUESTION 37: Does Dogs Trust believe the general public need to be well versed in the Animal Welfare Act to assess the suitability of a breeding establishment?

QUESTION 38: Does Dogs Trust feel this lack of awareness could be addressed by stronger education campaigns?

QUESTION 39: Does Dogs Trust feel that licensing would better enable the general public to assess the suitability of a breeding establishment than a personal visual inspection?

Educating potential dog owners to identify good breeders remains an ongoing task for many organisations including the Government. Removing the existing confusion which exists when the public are advised not to purchase from legitimate and licensed premises will be a significant positive development in the drive to empower the public to make responsible purchasing decisions.

RESCUE/REHOMING ORGANISATIONS ARE UNREGULATED AND AN EXEMPTION MAY LEAD TO TRADERS POSING AS RESCUE/REHOMING ORGANISATION TO EVADE A BAN

Dogs Trust highlights that there are currently no regulations for rehoming and rescue organisations.

QUESTION 40: Why does Dogs Trust consider that there is insufficient distinction between the commercial third party trade in puppies (i.e. actively purchasing animals with the express purpose of selling them on for a net profit) and the work of rehoming charities (i.e. obtaining abandoned or relinquished animals passively and rehoming them with no net profit resulting from the process) to enable a workable exemption to be included in legislation?

QUESTION 41: Has Dogs Trust explored the legal possibilities of a workable exemption for rescue and rehoming organisations?

In 2010, Dogs Trust’s Stop the Battery Farming of Dogs campaign explained the association between pet shops and puppy farming. “Dogs Trust does not consider that a pet shop is a suitable place for the sale of puppies. A lack of knowledge about how to properly go about acquiring a puppy results in many people unwittingly supporting the trade in puppy farmed and trafficked dogs.”

The current factsheets ‘Getting a Puppy’ continues to acknowledge this link:

“Newspapers/internet adverts, pet shops and pet superstores – just don’t go there! Many dogs are bred for a quick profit by what is often referred to as a ‘puppy farm’. They are raised without care or love and sold to unsuitable households. Many of these puppies are advertised through newspaper adverts or sold on the internet or at pet/puppy superstores.”

QUESTION 42: What suggestions does Dogs Trust have to ensure that pet shops do not sell puppies originating from puppy farms?

The Annual Review for 2015 states that “one of the key causes for dog abandonment is the relative ease with which puppies can be bought.”

QUESTION 43: Does Dogs Trust have any recommendations that would prevent pet shops from encouraging/enabling impulse purchases?

ENFORCEMENT AND TRACEABILITY

Dog’s Trust is “calling for a registration and licensing system to ensure better enforcement and traceability”. Under the Pet Animals Act 1951, third party sellers are already required to hold a pet shop licence if they are carrying on a business of selling dogs as pets.

QUESTION 44: How does Dogs Trust envisage that licensing third party sellers will ‘put power in the hands of the enforcers’ when it has identified that ‘Local Authorities are already overstretched’?

QUESTION 45: Does Dogs Trust have any evidence to demonstrate that local authorities are successfully using the licensing system to ensure that there is full traceability for licensed sellers of dogs?

QUESTION 46: If puppies are sold through a licensed third party seller, does Dogs Trust believe that traceability to the breeder through the “registration and licensing system” should – or could ensure that all those involved in the chain are accountable?

QUESTION 47: How would Dogs Trust ensure ‘transparency’ in third party sales if purchasers never see the puppy’s mother or assess the condition of the breeding establishment?

If puppies are sold directly from the breeder to the final purchaser it becomes far easier to locate where problems have occurred, e.g. the point of origin of disease. Where more than one party is involved in the supply chain, accountability becomes challenging, as pinpointing where a problem developed in the chain is far more difficult and may even be impossible if one factor compounds another. Local authorities are extremely reluctant to divert resources to investigate outbreaks of disease, particularly beyond the area of their own jurisdiction and therefore sellers are rarely able to be held accountable, far less the original breeder. The only way to ensure full accountability is to limit the supply chain to breeder and purchaser.

**QUESTION 48:** Does Dogs Trust believe that the existing licensing system is an effective means of ensuring welfare throughout the third party supply chain?

**ADVICE TO PURCHASERS**

Dogs Trust’s advice for buying a puppy states “Remember:Never buy from a pet shop” and urges purchasers to “Avoid buying from a pet shop/other retail outlet”.

**QUESTION 49:** Does Dogs Trust believe that this advice will be redundant when pet shops are deemed fit to legitimately operate under a revised licensing system?

**QUESTION 50:** Does Dogs Trust feel that the essential traceability and transparency of the licensing system should help give potential puppy buyers more confidence when considering purchasing a puppy from a third party seller?

**LINGEISNG VS A BAN**

Dogs Trust suggests that a ban on third party selling “would have unintended consequences for dog welfare at the current time”

**QUESTION 51:** Does Dogs Trust believe that a ban would be implementable in future?

**QUESTION 52:** Does Dogs Trust feel that its proposed system of licensing and registration would make a ban a more feasible option in future?

> **UNINTENDED CONSEQUENCES**

**QUESTION 53:** Does Dogs Trust consider that a system of licensing will increase the number of ‘good breeders’ in the UK or reduce the demand for puppies?

**QUESTION 54:** How will Dogs Trust ensure that illegal sellers will not continue to evade the requirement to licence by employing ‘even more devious ways’ to evade detection?

**QUESTION 55:** Does Dogs Trust believe that the requirement for licensing itself can be sufficiently well enforced if local authorities are overstretched?

**QUESTION 56:** Is Dogs Trust confident that extending licensing to a greater number of breeders will not act as a deterrent to breed, leading to even more traders choosing to supply puppies illegally?

**QUESTION 57:** Has Dogs Trust conducted research to ensure that the licence fee will not result in breeders raising the price of puppies to cover this additional cost?

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23https://www.dogstrust.org.uk/help-advice/advice-for-owners/buying-a-dog/buying-a-dog
QUESTION 58: Is Dogs Trust confident that traceability within the licensing system will ensure that stolen dogs are not incorporated into breeding programmes or sold illegally?

QUESTION 59: Does Dogs Trust believe that purchasers can be confident about the welfare of breeding dogs and puppies if they purchase from a licensed third party seller?

QUESTION 60: Why doesn’t Dogs Trust believe that licensing will ensure that purchasers are not faced with the dilemma of ‘rescuing’ puppies from low welfare breeding establishments?

QUESTION 61: Does Dogs Trust believe that extending the licensing remit will deal with the current problems that exist with both licenced and unlicenced dog breeding?

QUESTION 62: Would Dogs Trust advise the general public that a licence is a good indicator of the suitability of a breeding premise?

QUESTION 64: Does Dogs Trust believe that the requirement for a licence applied to rescue or rehoming organisations would ensure that traders do not set themselves up as a rescue or rehoming organisation to avoid being licensed?

SUMMARY

“Dogs Trust wants a registration and licensing system to be introduced which would put the power in the hands of the enforcers by providing essential traceability and transparency of everyone involved in the trade.”

This system is already in place in the UK under the Pet Animals Act 1951, which requires that anyone:

“carrying on at premises of any nature (including a private dwelling) of a business of selling animals as pets, and as including references to the keeping of animals in any such premises as aforesaid with a view to their being sold in the course of such a business, whether by the keeper thereof or by any other person”.

Licensing assumes that animal welfare needs can be met and the purpose of licensing is to sufficiently mitigate the risks and prevent harm from occurring, so as to reassure the public that good standards of animal welfare are maintained throughout the supply chain.

When the processes are so inherently damaging that it is impossible to effectively protect animal welfare with regulation – no matter how stringent – the result is an unacceptable level of risk for animal welfare, purchasers and society. Under these circumstances, licensing CANNOT be regarded as an appropriate solution because it does not meet the premise and the purpose cannot be met.

A ban is vital to protect the welfare of puppies and an essential first step to improving standards in high risk breeding establishments. Removing the legitimacy of a source where even adequate welfare cannot be ensured is imperative to support consumers in making responsible purchases.

QUESTION 65: Does Dogs Trust believe that it is in the best interests of animal welfare to rely on a system of licensing and registration to prevent purchasers buying underage, illegally imported or badly socialised puppies?

QUESTION 66: Does Dogs Trust believe that meeting the demand for puppies necessitates compromising on an ideal situation, where third party sales do not happen?

QUESTION 67: Does Dogs Trust believe that continuing to allow puppies to be sold by commercial third party traders will mean that puppies are bought for life, not just for Christmas?